

# BESPOKE TRAINING AND EDUCATION

## Safeguarding and Child Protection Policy

April 2026

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<b>Approved by</b>	Graham Coffey, Proprietor
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<b>Amendment summary</b>	Full redraft to reflect AP provider context; statutory references updated; Prevent section strengthened; 6Rs made consistent throughout

### Key Safeguarding Personnel

Role	Name	Contact
Proprietor	Graham Coffey	<a href="mailto:bespoke.te@gmail.com">bespoke.te@gmail.com</a> / 07966 436671
Designated Safeguarding Lead (DSL)	Brandon Hitchman	<a href="mailto:brandon.bespoke.te@gmail.com">brandon.bespoke.te@gmail.com</a>
Deputy DSL	Graham Coffey	<a href="mailto:http://bespoke.te@gmail.com">http://bespoke.te@gmail.com</a>
Single Point of Contact: Prevent (SPOC)	Brandon Hitchman	<a href="mailto:brandon.bespoke.te@gmail.com">brandon.bespoke.te@gmail.com</a>
Designated Teacher: Looked After Children	Graham Coffey	<a href="mailto:bespoke.te@gmail.com">bespoke.te@gmail.com</a>
Designated Lead: Online Safety	Graham Coffey	<a href="mailto:bespoke.te@gmail.com">bespoke.te@gmail.com</a>

Note: Graham Coffey holds several roles within BT&E as a small organisation. In any matter where Graham Coffey is the subject of a concern, all safeguarding responsibilities pass directly to Brandon Hitchman as DSL, who will contact the relevant Local Authority Designated Officer (LADO) without delay and without prior reference to Graham Coffey.

## Contents

1. About Bespoke Training and Education
2. Policy Statement and Scope
3. Legislative and Statutory Framework
4. Safeguarding Culture
5. Definitions
6. Recognising Harm and Abuse
7. Responding to Concerns: the 6Rs
8. Recording and Information Sharing
9. Inclusion and Additional Vulnerabilities
10. Online Safety
11. Prevent Duty
12. Child-on-Child Abuse
13. Looked After and Previously Looked After Children
14. Safer Recruitment
15. Allegations Against Staff and Volunteers
16. Roles and Responsibilities
17. Associated Policies
18. Key Contacts

Appendix A: Definitions of Abuse and Harm

Appendix B: The 6Rs at a Glance

Appendix C: Accountability Flowchart

## 1. About Bespoke Training and Education

Bespoke Training and Education (BT&E) is a limited company (registration number 09325333) providing short-term, part-time alternative provision to young people aged 14-18 who are unable to access or sustain mainstream education. BT&E is not a registered school. Placements are commissioned by local authorities, schools, and other referral bodies on an individual basis.

BT&E delivers nationally accredited programmes across several sites. These include:

- The Hollies Smallholding, Gnosall, Staffordshire: animal care, horticulture, equine care, and woodland programmes
- The Way Youth Zone, School Street, Wolverhampton: sports coaching, health and fitness, personal training
- Health and Wellbeing Centre, Castlecroft Avenue, Wolverhampton: wellbeing, personal development, and skills for life programmes

Programmes delivered include Animal Care, Equine Care, Horticulture, Sports Coaching, Health and Fitness, Personal Training, Hospitality and Catering, Business and Administration, Employability Skills, Functional Skills (English, Maths, IT), and Personal Development. Courses are accredited by AIM Qualifications and Assessment Group and run from Entry Level 1 to Level 2. Placements typically run for 5 to 12 weeks on a part-time basis.

BT&E also delivers a therapeutic support programme. Each young person has an allocated personal mentor. Counselling is available through a qualified therapist, available on Mondays (10:30 to 12:30), Wednesdays, and Fridays (9:00 to 12:30).

The young people BT&E works with frequently present with one or more of the following: Social, Emotional and Mental Health needs (SEMH); Speech, Language and Communication Needs (SLCN); Autism Spectrum Disorder (ASD); Moderate Learning Difficulties (MLD); and Specific Learning Difficulties (SpLD) including dyslexia and dyspraxia. Many have experienced exclusion, placement breakdown, or fragmented education histories. BT&E cannot assume that young people arriving on placement have a consistent understanding of safe relationships, appropriate boundaries, or how to seek help.

BT&E works within the safeguarding frameworks of the local authorities it serves: Walsall, Wolverhampton, and Staffordshire. All commissioned placements involve close working with referring schools, virtual school heads, social workers, and other relevant professionals.

## 2. Policy Statement and Scope

BT&E is committed to safeguarding and promoting the welfare of all children and young people in its care. Every person working for or with BT&E, whether employed, contracted, or volunteering, shares this responsibility.

BT&E operates on the principle that safeguarding concerns can arise in any setting at any time. Our position is: it could happen here. All staff, contracted workers, and volunteers are required to read, understand, and work within this policy.

This policy applies to all BT&E activities across all delivery sites and any off-site activity undertaken on behalf of BT&E. It applies to all staff, volunteers, contractors, and any third-party organisations providing services to young people on BT&E placements.

This policy is reviewed annually. It will be updated between reviews where legislation, statutory guidance, or local safeguarding procedures change, or where a local or national learning event makes an update necessary. The DSL and proprietor are jointly responsible for ensuring the policy remains current.

This policy is published on the BT&E website and provided to parents, carers, and young people at the point of enrolment. A learner-facing summary is provided separately at induction.

### 3. Legislative and Statutory Framework

BT&E acts in accordance with the following legislation and statutory guidance:

Keeping Children Safe in Education (KCSIE)	September 2025. The primary statutory guidance for BT&E's safeguarding arrangements. All staff read and sign acceptance of Part 1 at induction. Senior staff read the document in full.
Working Together to Safeguard Children	December 2023 (His Majesty's Government). Defines multi-agency safeguarding responsibilities.
Counter-Terrorism and Security Act 2015	As enhanced by the Prevent Duty Guidance December 2023. Places a duty on BT&E to have due regard to the need to prevent people being drawn into terrorism.
Children Act 1989 and 2004	Establishes the legal framework for child protection, including Section 17 (children in need) and Section 47 (children at risk of significant harm).
Education Act 2002, Section 157	Places a duty on independent schools and providers to safeguard and promote the welfare of children.
Human Rights Act 1998	Underpins rights to safety, privacy, and education.
Equality Act 2010	Including the Public Sector Equality Duty. BT&E does not discriminate in its safeguarding response.
Data Protection Act 2018 and UK GDPR	Governs information sharing and record keeping. Data protection law is not a barrier to sharing information where a child's safety is at risk.
Relationships, Sex and Health Education Guidance	Revised July 2025, implemented from September 2026. BT&E's RSHE provision will be updated accordingly.

All legislative references in this policy are verified as of April 2026. The DSL is responsible for ensuring references remain current at each annual review.

BT&E follows the child protection procedures of the local safeguarding partnerships in its delivery areas:

- Walsall Safeguarding Partnership: [walsallsp.co.uk](http://walsallsp.co.uk)
- Wolverhampton Safeguarding Together: [wolverhamptonsafeguarding.org.uk](http://wolverhamptonsafeguarding.org.uk)
- Staffordshire Safeguarding Children Partnership: [staffsscp.org.uk](http://staffsscp.org.uk)

## 4. Safeguarding Culture

BT&E's safeguarding culture is built on the principle that every young person who comes to us deserves to feel safe, to be heard, and to be treated with dignity and respect. Safeguarding is not a compliance exercise. It is at the centre of everything BT&E does.

Our ethos is trauma-informed. Many young people on BT&E placements have experienced adverse childhood experiences, placement breakdown, or fragmented relationships with adults and institutions. Staff approach all interactions with professional curiosity, patience, and care. They do not assume safety because a young person does not disclose. Absence of disclosure is not absence of concern.

BT&E builds trusted relationships with young people through its Chats 4 Change programme. Each young person receives regular one-to-one tutorials with their personal mentor. These sessions cover wellbeing, safety, and individual progress. Key safeguarding topics are revisited each term, including:

- what to do if they do not feel safe, whether at BT&E, at home, online, or in the community
- who the DSL and deputy DSL are, and how to contact them
- what constitutes appropriate adult-child and peer interactions
- how to raise a concern and what will happen when they do
- the fact that BT&E's priority is to help and to listen

All young people are made aware at induction that BT&E has a responsibility to keep them safe, and that there are some things staff will need to pass on to keep them protected. Staff never promise confidentiality they cannot maintain.

A learner-facing summary of this policy, written in accessible language, is provided at induction and is available on request. For young people with SEND, EAL needs, or low literacy, staff will ensure the summary is explained verbally and that understanding is checked.

All staff understand that children may not feel ready or able to disclose abuse. They may feel embarrassed, ashamed, or threatened. They may not recognise their experience as harmful. This does not reduce staff responsibility to act on concern. Professional curiosity means noticing what is not said, as well as what is.

## 5. Definitions

Child / Young Person	Any person under the age of 18.
Safeguarding	Protecting children from maltreatment; preventing impairment of health or development; ensuring children grow up in circumstances consistent with safe and effective care; taking action to enable the best outcomes.
Child Protection	The activity undertaken to protect specific children who are suffering, or are at risk of suffering, significant harm.
Designated Safeguarding Lead (DSL)	The named senior person with lead responsibility for safeguarding and child protection. At BT&E this is Brandon Hitchman.
Vulnerable Adult	A person aged 18 or over who, by reason of mental or other disability, age, illness, or other circumstance, is or may be unable to take care of themselves or protect themselves against significant harm or exploitation.
Regulated Activity	Work with children that is subject to DBS checking requirements, including teaching, training, care, and supervision on a frequent or intensive basis.
LADO	Local Authority Designated Officer. The person responsible for overseeing allegations against staff who work with children.
MASH	Multi-Agency Safeguarding Hub. The first point of contact for safeguarding referrals in most local authorities.
Early Help	Support provided to children and families at the first sign of need, before problems escalate.

## 6. Recognising Harm and Abuse

All staff are trained to recognise indicators of abuse, neglect, and exploitation. Abuse can take place within families, in institutional settings, in the community, online, or by other children. It can be perpetrated by adults or by peers. The four main categories of abuse are defined in full in Appendix A.

### Categories of abuse

includes hitting, shaking, throwing, burning, scalding, drowning, suffocating, or fabricating illness in a child.

the persistent emotional maltreatment of a child, causing severe and adverse effects on emotional development. Includes conveying that a child is worthless, unloved, or valued only insofar as they meet the needs of another.

forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. Includes physical contact and non-contact activities, and can occur online.

the persistent failure to meet a child's basic physical and/or psychological needs. Includes failure to provide adequate food, clothing, shelter, supervision, or access to medical care.

### Additional safeguarding issues

Staff are also alert to the following specific risks, which are particularly relevant to BT&E's cohort:

- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including county lines
- Domestic abuse, including teenage relationship abuse
- Honour-based abuse, including Female Genital Mutilation (FGM) and forced marriage
- Radicalisation and the risk of being drawn into terrorism
- Online safety risks, including grooming, sharing of indecent images, and cyberbullying
- Serious violence and gang involvement
- Mental health difficulties as a safeguarding concern
- Children who are absent from provision without explanation
- Children who are privately fostered
- Children who are homeless or at risk of homelessness
- Young carers

Detailed guidance on recognising each of these issues, including specific indicators, is contained in Annex A of KCSIE 2025, which all BT&E staff read at induction.

### FGM: mandatory reporting

Where a member of staff discovers that an act of FGM appears to have been carried out on a girl under 18, there is a statutory duty to report this directly to the police. This duty sits with the individual member of staff, not solely with the DSL. Staff will still consult the DSL as soon as possible and involve Children's Services as appropriate.

### Mental health as a safeguarding concern

Mental health difficulties can, in some cases, indicate that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. BT&E staff are not qualified to diagnose mental health conditions, but they are well placed to observe changes in behaviour and emotional state. Any mental health concern that affects a young person's safety or wellbeing is treated as a safeguarding concern and referred to the DSL without delay.

## 7. Responding to Concerns: the 6Rs

All BT&E staff follow the 6Rs framework when a concern arises or a disclosure is made. The 6Rs are: Receive, Reassure, React, Record, Refer, Reflect. This framework applies consistently across all safeguarding situations and is cross-referenced in Appendix B and in the accountability flowchart at Appendix C.

<b>RECEIVE</b>	Give the young person time and space to speak. Never ask them to come back later. Do not stop someone who is freely recalling information. Listen without interruption. Never promise confidentiality: tell the young person that if what they share indicates they may be at risk, you will need to speak to someone who can help.
<b>REASSURE</b>	Tell the young person they have done the right thing in speaking to you. They have not done anything wrong. If there is a concern about harm, tell them you will speak to someone to get help. Do not minimise what they have shared.
<b>REACT</b>	If clarification is needed, use open questions only: 'Can you tell me more about that?' or 'Can you describe what happened?' Never ask leading or suggestive questions. Never ask 'Why didn't you tell someone earlier?' Never criticise the alleged perpetrator, who may still be part of the young person's life. Do not ask the young person to repeat their account to another member of staff.
<b>RECORD</b>	Make notes as soon as possible, using the young person's own words. Record what you saw and heard, not your interpretation or assumptions. Include the date, time, and location. Do not destroy original notes. Do not ask the young person to write their own account or sign any documentation. Records must be on BT&E's safeguarding management system within one hour.
<b>REFER</b>	Refer immediately to the DSL (Brandon Hitchman) or, if unavailable, the deputy DSL (Graham Coffey). Do not leave the building at the end of the day without having spoken to the DSL or deputy DSL about the concern. If neither is reachable and there is immediate risk to a child, contact the relevant LA Children's Services or call 999 directly. Any action taken in this way must be reported to the DSL as soon as possible afterwards.
<b>REFLECT</b>	Ask yourself whether you have done everything within your role. Consider whether you have any additional information, such as knowledge of siblings or previous contact with the family, that the DSL should know. Recognise that dealing with disclosures can be difficult. Seek support from the DSL, from a colleague, or from an appropriate external source, while maintaining confidentiality.

### When a child is in immediate danger

If a child is in immediate danger, call 999 first. The 6Rs procedure follows once immediate safety is secured. Do not delay emergency action to follow internal procedures.

## Referral contacts by local authority

Role	Name	Contact
Walsall MASH	Multi-Agency Safeguarding Hub	0300 555 2866 (Mon-Thu 8:45-5:15, Fri 8:45-4:45)
Walsall Emergency	Emergency Response Team	0300 555 2922 or 0300 555 2836
Wolverhampton Children's Services		01902 555392 (Mon-Thu 8:30-5:00, Fri 8:30-4:30)
Wolverhampton Out of Hours		01902 552999
Staffordshire SCAS	Children's Advice and Support	0300 111 8007 (Mon-Thu 8:30-5:00, Fri 8:30-4:30)
Staffordshire Emergency	Emergency Duty Service	0345 604 2886

## 8. Recording and Information Sharing

BT&E keeps detailed, accurate, and secure written records of all safeguarding concerns, discussions, and decisions, including the rationale for decisions made. Records include instances where a referral was or was not made, and the reasons for that decision.

All concerns are recorded on BT&E's safeguarding management system as soon as possible, and in any case within one hour. Records must include: a clear and comprehensive summary of the concern; details of how it was followed up; any action taken; decisions reached; and the outcome.

When a young person leaves BT&E, the DSL ensures their child protection file is transferred securely to the receiving school or next provision. Transfer is made separately from the general programme file. Written confirmation of receipt is obtained.

### Information sharing

The Data Protection Act 2018 and UK GDPR are not barriers to information sharing where a child's safety is at risk. BT&E shares information with consent where possible and respects the wishes of those who do not consent, unless there is a lawful basis to share regardless. Where sharing without consent, BT&E records the basis for the decision.

BT&E follows the seven golden rules for sharing information as set out in the government's information sharing advice for safeguarding practitioners (updated May 2024):

- GDPR and data protection law do not prevent justified information sharing.
- Be open and honest about why and how information will be shared.
- Seek advice if in doubt, without disclosing identity where possible.
- Share with consent where possible; share without consent where safety requires it.
- Base decisions on safety and wellbeing of the individual and others.
- Ensure information shared is necessary, proportionate, accurate, timely, and secure.
- Keep a record of the decision and the reasons for it.

BT&E informs referring schools and commissioning bodies of any safeguarding concerns arising during a placement, in line with agreed information sharing arrangements established at the point of referral.

## 9. Inclusion and Additional Vulnerabilities

Inclusion and safeguarding are inseparable at BT&E. Many of the young people on BT&E placements face additional vulnerabilities that affect both their safety and their ability to disclose concerns. BT&E's approach is to understand and respond to each young person as an individual, using a graduated and person-centred model.

### Young people with SEND

Young people with special educational needs and disabilities can face additional safeguarding challenges. Indicators of abuse may be attributed incorrectly to a disability. Children with SEND can be disproportionately affected by bullying without showing outward signs. Communication barriers may prevent disclosure.

BT&E receives information about each young person's SEND needs at referral, including EHCP documentation and SEN support plans. This information directly shapes how safeguarding information is communicated to the young person and how concerns are identified and followed up. Any safeguarding concern involving a young person with SEND is discussed between the DSL and the SENCO role (currently Graham Coffey).

### Care-experienced young people

The most common reason children enter care is abuse and neglect. Care-experienced young people may remain vulnerable after leaving care. BT&E staff are alert to the additional risks and barriers faced by looked after and previously looked after young people, including attachment difficulties, placement instability, and reduced networks of trusted adults.

### Young people with a social worker

Where a young person has a social worker, this is an indicator of elevated risk. BT&E flags this on the young person's record, shares relevant information with the social worker as agreed, and takes the social worker's involvement into account when planning support. The DSL liaises directly with the social worker on any new concerns arising during the placement.

### EAL young people

Young people whose first language is not English may face additional barriers to disclosure. BT&E uses accessible communication, visual materials, and where necessary, appropriate interpretation support to ensure these young people can participate fully and raise concerns safely.

### Young people at risk of exploitation

BT&E is alert to indicators of both child sexual exploitation (CSE) and child criminal exploitation (CCE), including county lines. Given the cohort BT&E works with, including young people who have been excluded or who have had contact with the justice system, these risks are specifically assessed at referral and monitored throughout the placement.

### Anti-bullying

Bullying, including cyberbullying and prejudice-based bullying, is not tolerated at BT&E. Any incident of bullying is reported to the DSL, recorded, and addressed. Where bullying reaches a safeguarding threshold it is treated as a safeguarding concern and follows the 6Rs procedure. BT&E's anti-bullying approach is set out in its standalone Anti-Bullying Policy.

### Graduated approach

BT&E uses an Assess, Plan, Do, Review cycle to identify and respond to additional vulnerability. At referral, the DSL and programme lead assess the young person's needs and risk factors. A support plan is agreed. This is reviewed at regular progress meetings throughout the placement, and the DSL is updated on any changes. Escalation routes to Children's Services are always available and are used without hesitation where risk increases.

## 10. Online Safety

BT&E recognises that online risks are a significant and growing component of safeguarding. Technology is used to facilitate offline abuse as well as to cause harm directly online. Online safety is taught as part of BT&E's PSHE and personal development programmes.

The DSL has lead responsibility for online safety at BT&E, with day-to-day oversight delegated to Graham Coffey. BT&E ensures that appropriate filtering and monitoring systems are in place across all sites where internet access is provided to young people. These are reviewed regularly for effectiveness.

BT&E's online safety approach covers four areas of risk:

- Content: exposure to illegal, inappropriate, or harmful material, including pornography, extremist content, and misinformation.
- Contact: harmful online interaction with others, including grooming, predatory behaviour, and exploitation facilitated through social media.
- Conduct: personal behaviour online that causes or increases the likelihood of harm, including sexting, cyberbullying, and sharing of indecent images.
- Commerce: financial risks including online gambling, phishing, and scams.

Staff are alert to online risks in the context of the young people they work with, including the non-consensual sharing of images, online grooming, and the use of technology to facilitate CSE and radicalisation. Any online safety concern is reported to the DSL and recorded using the same procedures as any other safeguarding concern.

BT&E does not view, download, or share any indecent imagery involving a young person. If such imagery is encountered, the DSL is notified immediately. The imagery is not deleted, and the young person is not asked to delete it.

BT&E communicates with parents and carers about online safety, including the filtering and monitoring arrangements in place and the topics covered in the curriculum.

## 11. Prevent Duty

Under the Counter-Terrorism and Security Act 2015, as enhanced by the Prevent Duty Guidance December 2023, BT&E has a duty to have due regard to the need to prevent people being drawn into terrorism. BT&E treats this duty as an integral part of its safeguarding responsibilities, not as a separate compliance obligation.

### Approach: safeguarding, not surveillance

BT&E's Prevent approach is explicitly framed as safeguarding. The duty is to identify vulnerability and provide support, not to monitor political or religious opinion. BT&E does not treat young people as suspects. Staff are trained to distinguish between a young person exploring ideas and a young person who may be at risk of radicalisation.

### Local risk context

BT&E delivers across Walsall, Wolverhampton, and Staffordshire. The DSL maintains awareness of local Prevent risk assessments and is in contact with the named Prevent coordinators for each delivery area:

- Walsall: Niall Markham, Walsall Prevent Coordinator. [niall.markham@walsall.gov.uk](mailto:niall.markham@walsall.gov.uk)
- Wolverhampton: Deborah Smith, Wolverhampton Prevent Coordinator. [Deborah.smith@wolverhampton.gov.uk](mailto:Deborah.smith@wolverhampton.gov.uk) or 01902 551 214
- Staffordshire: Staffordshire Police Prevent Team. 01785 232054. [prevent.staffordshire.police.uk](http://prevent.staffordshire.police.uk)

BT&E's local risk assessment considers the range of extremism types relevant to its delivery areas and the backgrounds of young people on placement, including the possibility of vulnerability to right-wing extremism, Islamist extremism, and other forms of radicalisation. This assessment is reviewed by the DSL annually and updated when local intelligence changes.

### Recognising radicalisation

Early indicators that a young person may be vulnerable to radicalisation include:

- Expressing sympathy for extremist causes or glorifying violence
- Sharing extremist content online or in conversation
- Intolerance of others based on faith, culture, gender, race, or sexuality
- Sudden changes in dress, behaviour, or peer relationships not otherwise explained
- Secretive behaviour about online activity or new relationships
- References to extremist narratives, organisations, or ideologies
- Verbalising anti-Western or anti-British views in a context that suggests ideological alignment

The presence of one or more indicators does not mean a young person is being radicalised. Staff use professional judgement and refer to the DSL, who will assess proportionately.

### BT&E's curriculum and British Values

BT&E promotes fundamental British values across all its programmes: democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Where political or social issues arise in sessions, staff present balanced perspectives and do not promote partisan views. The curriculum includes content on how extremist views are spread, particularly online, and builds young people's critical thinking and resilience.

### **Channel referrals**

Brandon Hitchman is BT&E's Single Point of Contact (SPOC) for all Channel referrals. Channel is a voluntary, multi-agency programme providing support to people identified as vulnerable to being drawn into terrorism. Where the DSL has concerns about a young person's vulnerability to radicalisation, they will consult the relevant Prevent coordinator and, where appropriate, make a Channel referral. Staff who have a concern refer first to the SPOC.

### **Staff training**

All staff complete Educate Against Hate online training at induction, refreshed annually. All staff also complete ACT (Action Counters Terrorism) awareness training, which is particularly important for staff working at community venues and public-facing sites. Completion is recorded on BT&E's Single Central Record and reviewed by the DSL. The DSL and deputy DSL receive dedicated Prevent duty training every two years.

### **Animal care and equine settings**

BT&E delivers programmes in animal care and equine management at The Hollies Smallholding. Staff in these settings are alert to the specific risk of animal rights extremism, which represents an additional strand of radicalisation relevant to education and care settings working with animals. Any indicators of interest in extremist animal rights ideology are reported to the DSL in the same way as other radicalisation concerns.

## 12. Child-on-Child Abuse

BT&E recognises that children can abuse other children. This includes abuse that occurs within the provision, outside it, and online. Child-on-child abuse is never dismissed as banter, having a laugh, or part of growing up. It is treated with the same seriousness as abuse perpetrated by an adult.

Child-on-child abuse may include: bullying (including cyberbullying and prejudice-based bullying); abuse in intimate relationships between young people; physical abuse; sexual violence and sexual harassment; non-consensual sharing of images; upskirting; and initiation or hazing-type behaviour.

All victims are taken seriously. Evidence shows that girls, young people with SEND, and lesbian, gay, bisexual, and gender-questioning young people face elevated risk. BT&E is alert to these additional vulnerabilities.

Where a concern about child-on-child abuse is identified, the DSL is informed immediately. The needs of the victim and the alleged perpetrator are considered separately. A risk assessment is completed and kept under review. Referrals to Children's Services and, where appropriate, the police are made without delay where risk of harm is present.

BT&E's curriculum addresses healthy relationships, consent, appropriate boundaries, and the unacceptability of all forms of sexual harassment and violence. This is delivered through the PSHE and personal development programmes.

## 13. Looked After and Previously Looked After Children

The most common reason children enter care is abuse or neglect. BT&E ensures that all staff working with looked after or previously looked after young people have the skills, knowledge, and understanding to keep them safe and to promote their educational progress.

Graham Coffey is BT&E's designated teacher for looked after and previously looked after children. The DSL holds details of each looked after young person's social worker and, where relevant, the name of the virtual school head in the authority responsible for that child.

BT&E works with the virtual school head to agree target-setting, qualification levels, and programme content for looked after young people on placement. This includes Pupil Premium Plus funding discussions where relevant.

Where a young person has left care through adoption, special guardianship, or child arrangement orders, BT&E applies the same level of attentiveness and support as for those currently in care.

## 14. Safer Recruitment

BT&E is committed to safer recruitment processes that deter and prevent people who are unsuitable to work with children from being employed or engaged in any capacity. These processes apply to all staff, volunteers, contractors, and agency workers.

### Pre-appointment checks

Before any person begins work with BT&E, the following checks are completed and recorded on the Single Central Record (SCR):

- Identity verification, including birth certificate where possible
- Enhanced DBS check including children's barred list information for those in regulated activity
- Right to work in the UK
- Medical fitness for the role
- Verification of qualifications
- Prohibition from teaching check (where applicable)
- Section 128 check for any management roles
- Overseas checks where the applicant has lived or worked outside the UK

All offers of appointment are conditional until all required checks are satisfactorily completed. No person in regulated activity begins work with young people until a satisfactory DBS check is in place, or a separate barred list check has been carried out where a start is required before the DBS certificate arrives.

### References

BT&E obtains two references for all appointments, at least one from the most recent employer. References are sought before interview where possible. BT&E does not accept open references. All references are verified directly with the referee.

### Online checks

All shortlisted candidates are subject to an online search as part of due diligence. Any information found is explored with the candidate at interview.

### Single Central Record

BT&E maintains an SCR recording all pre-appointment checks for all staff, volunteers, contracted workers, and agency supply staff. The SCR is reviewed for accuracy by a senior member of staff regularly. The SCR also records completion of mandatory training including safeguarding, Prevent (Educate Against Hate and ACT), and first aid.

### Safer recruitment training

Key staff involved in recruitment complete Safer Recruitment training as provided by the relevant local authority safeguarding partnership. This is renewed every two years.

### Agency and supply staff

Where BT&E uses agency or supply staff, written confirmation is obtained from the agency that all required checks have been carried out. BT&E always verifies that the person presenting for work is the same person on whom checks have been made.

### Volunteers

No volunteer on whom no checks have been obtained is left unsupervised with young people or allowed to engage in regulated activity. A risk assessment is completed for every volunteer, covering the nature of their work, the level of supervision required, and what is known about the individual.

## 15. Allegations Against Staff and Volunteers

BT&E operates an open and transparent culture in which concerns about the conduct of any adult are shared promptly and dealt with appropriately. This includes concerns that do not reach the harm threshold, sometimes called low-level concerns.

### **Allegations reaching the harm threshold**

Where it is alleged that a member of staff, volunteer, or contractor has: behaved in a way that has harmed or may have harmed a child; possibly committed a criminal offence against a child; behaved in a way that indicates a risk of harm to children; or behaved in a way that indicates they may not be suitable to work with children, the following procedure applies.

The allegation is reported immediately to Graham Coffey as proprietor, unless the concern relates to Graham Coffey himself, in which case it is reported directly to Brandon Hitchman as DSL. Brandon Hitchman will contact the LADO without delay and without reference to Graham Coffey.

The LADO contacts for each delivery area are:

- Walsall LADO: 01922 654545 / lado@walsall.gov.uk
- Staffordshire LADO: 0300 111 8007, Option 1, Option 5, Option 2
- Wolverhampton LADO: Kelly Matthews / 01902 550 661 / LADO@wolverhampton.gov.uk

Suspension is not an automatic response to an allegation. All options to avoid suspension are considered. Where suspension is necessary, written confirmation is provided within one working day and the individual is informed of their named contact throughout the process.

### **Low-level concerns**

A low-level concern is any concern, however small, that an adult working for or with BT&E may have acted in a way inconsistent with BT&E's code of conduct or that does not meet the harm threshold. Examples include: being overly familiar with a young person; taking photographs on a personal phone; meeting a young person alone without authorisation; using inappropriate language.

All low-level concerns are reported to the DSL and recorded in writing. Records include the nature of the concern, the context, and the action taken. Records are held confidentially and reviewed regularly to identify patterns. Low-level concerns about supply or contracted staff are shared with their employer.

### **Whistleblowing**

All staff and volunteers can raise concerns about poor or unsafe practice without fear of reprisal. Where a concern cannot be raised internally, staff are directed to the NSPCC Whistleblowing Helpline: 0800 800 5000 (Monday to Friday, 8:00 to 20:00) or help@nspcc.org.uk.

## 16. Roles and Responsibilities

### **The Proprietor: Graham Coffey**

Graham Coffey, as proprietor, is accountable for BT&E's safeguarding arrangements. His responsibilities include: ensuring appropriate policies and procedures are in place; ensuring filtering and monitoring systems are effective; ensuring safeguarding training is completed; ensuring this policy is reviewed annually; and ensuring BT&E contributes to inter-agency working in line with statutory guidance.

### **The Designated Safeguarding Lead: Brandon Hitchman**

Brandon Hitchman is BT&E's DSL and has lead responsibility for safeguarding, child protection, and online safety. The DSL's responsibilities include:

- Receiving and assessing all safeguarding concerns from staff
- Making referrals to Children's Services, the police, the Channel programme, and the DBS as required
- Acting as SPOC for all Channel referrals
- Maintaining oversight of filtering and monitoring systems
- Ensuring safeguarding records are accurate, secure, and up to date
- Liaising with referring schools, social workers, virtual school heads, and other statutory partners
- Supporting staff following a disclosure or difficult concern
- Leading staff training and induction on safeguarding
- Keeping the proprietor informed of all safeguarding activity

The DSL or deputy DSL is always available during BT&E operating hours. Where neither is available in person, contact is available by phone or electronic means. Where a concern arises and neither can be reached, staff contact Children's Services directly and notify the DSL as soon as possible afterwards.

### **Deputy DSL: Graham Coffey**

Graham Coffey acts as deputy DSL and takes full DSL responsibilities in Brandon Hitchman's absence. The deputy DSL is trained to the same standard as the DSL.

### **All staff and volunteers**

Every person working for or with BT&E is responsible for: being alert to signs and indicators of abuse and neglect; following the 6Rs procedure when a concern arises; not promising confidentiality they cannot maintain; and never leaving the premises at the end of a session without discussing any safeguarding concern with the DSL or deputy DSL.

BT&E expects all staff to conduct themselves in accordance with BT&E's Staff Code of Conduct at all times. Staff who observe concerning behaviour by a colleague have a responsibility to report it.

## 17. Associated Policies

This policy is read and applied alongside the following BT&E policies. All documents listed must be producible on request:

Anti-Bullying Policy	Procedures for identifying, recording, and responding to bullying including cyberbullying.
Behaviour Policy	BT&E's approach to behaviour management, including positive behaviour support.
Online Safety Policy	Standalone policy covering filtering, monitoring, and safe use of technology.
Safer Recruitment and Selection Policy	Detailed procedures for all pre-appointment checks.
Staff Code of Conduct	Expected standards of behaviour for all staff and volunteers.
Whistleblowing Policy	Procedures for raising concerns about practice or conduct.
SEND and Accessibility Policy	BT&E's approach to meeting the needs of young people with SEND.
Equality, Diversity and Inclusion Policy	BT&E's commitment to equality in all its activities.
Data Protection Policy	Procedures for handling personal data in compliance with UK GDPR.
Health and Safety Policy	Site-specific health and safety arrangements including risk assessments.
Complaints Policy	Procedures for making and responding to complaints.
Attendance Policy	Recording, monitoring, and following up attendance, including unexplained absence.

## 18. Key Contacts

### BT&E safeguarding contacts

Role	Name	Contact
DSL / SPOC	Brandon Hitchman	brandon@bespoke-te.org
Deputy DSL / Proprietor	Graham Coffey	bespoke.te@gmail.com / 07966 436671

### LADO contacts

Role	Name	Contact
Walsall LADO		01922 654545 / lado@walsall.gov.uk
Wolverhampton LADO	Kelly Matthews	01902 550 661 / LADO@wolverhampton.gov.uk
Staffordshire LADO		0300 111 8007 (Option 1, 5, 2)

### Children's Services: referral contacts

Role	Name	Contact
Walsall MASH		0300 555 2866
Walsall Emergency		0300 555 2922 or 0300 555 2836
Wolverhampton Children's Services		01902 555392
Wolverhampton Out of Hours		01902 552999
Staffordshire SCAS		0300 111 8007
Staffordshire Emergency Duty		0345 604 2886

### Prevent coordinators

Role	Name	Contact
Walsall Prevent	Niall Markham	niall.markham@walsall.gov.uk
Wolverhampton Prevent	Deborah Smith	Deborah.smith@wolverhampton.gov.uk / 01902 551 214
Staffordshire Police Prevent		01785 232054

### Other key contacts

Role	Name	Contact
NSPCC Whistleblowing		0800 800 5000 / help@nspcc.org.uk
Operation Encompass Helpline		0204 513 9990 (Mon-Fri 8:00-13:00)
Channel guidance		GOV.UK: Channel and Prevent Multi-Agency Panel
Educate Against Hate		educateagainsthate.com
CEOP		ceop.police.uk

## Appendix A: Definitions of Abuse and Harm

The following definitions are drawn from Keeping Children Safe in Education September 2025 and Working Together to Safeguard Children December 2023.

### Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates or induces illness in a child.

### Emotional abuse

The persistent emotional maltreatment of a child causing severe and adverse effects on the child's emotional development. It may involve conveying that a child is worthless or unloved, inadequate, or valued only insofar as they meet the needs of another. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations, overprotection, preventing normal social interaction, witnessing the ill-treatment of another, serious bullying, or the exploitation or corruption of a child.

### Sexual abuse

Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. Activities may involve physical contact including assault by penetration, or non-penetrative acts. They may also include non-contact activities such as involving children in looking at or producing sexual images, watching sexual activities, or grooming a child for abuse. Sexual abuse can take place online. It is not solely perpetrated by adult males: women and other children can also commit acts of sexual abuse.

### Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect may involve failing to provide adequate food, clothing, and shelter; failing to protect from physical and emotional harm; failing to ensure adequate supervision; or failing to ensure access to appropriate medical care.

### Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into sexual activity. The victim may not recognise the exploitative nature of the relationship. CSE can affect any child, including 16 and 17 year olds who can legally consent to sex.

### Child Criminal Exploitation (CCE)

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into criminal activity. This includes being forced to transport drugs or money (county lines), working in cannabis factories, or committing violence. The victim may appear to be acting voluntarily.

### Domestic abuse

Any incident or pattern of incidents of controlling, coercive, or threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. Children can be victims of domestic abuse directly and through witnessing its effects.

### Female Genital Mutilation (FGM)

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It is illegal in the UK. Where a teacher discovers that an act of FGM appears to have been carried out on a girl under 18, there is a mandatory statutory duty to report this to the police personally.

## Appendix B: The 6Rs at a Glance

This summary is for reference. The full 6Rs procedure is set out in Section 7.

<b>RECEIVE</b>	Listen. Give time. Never promise confidentiality.
<b>REASSURE</b>	They have done the right thing. They are not in trouble.
<b>REACT</b>	Open questions only. No leading questions. Do not ask them to repeat themselves.
<b>RECORD</b>	Their words, not yours. Within one hour. On the safeguarding system.
<b>REFER</b>	To the DSL or deputy DSL. Do not leave the building without doing this.
<b>REFLECT</b>	Have you done everything you can? Do you need support?

## Appendix C: Accountability Flowchart

The following flowchart sets out BT&E's accountability structure for safeguarding concerns. Named contacts are consistent with Section 18 and the cover table.

### STEP 1: CONCERN IDENTIFIED

Any staff member, volunteer, contractor, young person, or parent/carer identifies a concern about a child's safety or welfare.

### STEP 2: IMMEDIATE SAFETY CHECK

Is the child in immediate danger? YES: call 999 immediately. NO: proceed to Step 3. Do not leave the premises without speaking to the DSL or deputy DSL.

### STEP 3: DSL RECEIVES AND ASSESSES

DSL: Brandon Hitchman. Deputy DSL: Graham Coffey. The DSL assesses risk level: Low (monitor and support), Medium (early help / Family Help), High (refer to Children's Services without delay). Concern about a member of staff: contact LADO before any internal process.

### STEP 4: RECORD AND SHARE

All concerns recorded on BT&E's safeguarding system within one hour. Information shared with Children's Services, the police, virtual school head, referring school, or other relevant partners as appropriate. Data protection law does not prevent sharing where safety is at risk.

### STEP 5: REFERRAL WHERE REQUIRED

Children's Services (MASH) for Section 17 or Section 47 concerns. Police where a crime may have been committed. Channel / SPOC for Prevent concerns. LADO for allegations against staff. DBS where a barring referral may be required.

### STEP 6: REVIEW AND GOVERNANCE

DSL reports all safeguarding activity to the proprietor (Graham Coffey) monthly. Policy reviewed annually by DSL and proprietor. Any lessons from local or national safeguarding reviews applied to policy and practice without waiting for the annual review cycle.

For full contact details for all referral routes, see Section 18.